

Douglas J. Campion (SBN 75381)
doug@djcampion.com
LAW OFFICES OF DOUGLAS J. CAMPION, APC
409 Camino Del Rio South, Suite 303
San Diego, California 92108
Tel: 619.299.2091
Fax: 619.858.0034

Jay Edelson (Admitted *pro hac vice*)
jedelson@edelson.com
Rafey S. Balabanian (Admitted *pro hac vice*)
rbalabanian@edelson.com
Benjamin H. Richman (Admitted *pro hac vice*)
brichman@edelson.com
EDELSON PC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378

[Additional Counsel on Signature Block]

Counsel for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

WESLEY THORNTON, AILEEN
MARTINEZ, CHIQUITA BELL, TEYIA
BOLDEN, and ANTOINETTE
STANSBERRY, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NCO FINANCIAL SYSTEMS, INC., a
Pennsylvania Corporation,

Defendant.

Case No. 3:13-cv-00131-BAS-JLB

**STATUS REPORT REGARDING
DECEMBER 7, 2015 MEDIATION**

Judge: Hon. Cynthia A. Bashant

Magistrate: Hon. Jill L. Burkhardt

Courtroom: 4B

1 Plaintiffs Wesley Thornton, Aileen Martinez, Chiquita Bell, Teyia Bolden, and
 2 Antoinette Stansberry (collectively "Plaintiffs"), jointly with Defendant NCO Financial
 3 Systems, Inc., (collectively "the Parties") by and through their undersigned counsel,
 4 respectfully provide the Court with the following status report regarding their December
 5 7, 2015 mediation and their ongoing settlement efforts, pursuant to this Court's order
 6 dated November 17, 2015 (ECF No. 211).

7 As scheduled, on December 7, 2015, the Parties participated in a private
 8 mediation before the Honorable Morton Denlow (ret.) of JAMS (Chicago). After a full
 9 day of negotiations and with Judge Denlow's assistance, the Parties made significant
 10 progress toward reaching a class-wide resolution of this action. The Parties are now
 11 working to confirm the final terms of an agreement in principle that would resolve this
 12 matter in its entirety and expect that they will be able to do so within twenty-one (21)
 13 days. The Parties are confident that they will have finalized the terms of an agreement
 14 in principle before that time, but seek to continue the stay for twenty-one (21) days
 15 (rather than a shorter period) out of an abundance of caution and given the upcoming
 16 holidays.

17 Accordingly, the Parties respectfully request that the Court continue the stay of
 18 this matter for an additional twenty-one (21) days, at which point they will submit a
 19 further status report informing the Court whether they have finalized their agreement in
 20 principle (if they have not done so earlier).

21 Respectfully Submitted,

22 **WESLEY THORNTON, AILEEN**
 23 **MARTINEZ, CHIQUITA BELL, TEYIA**
 24 **BOLDEN, and ANTOINETTE**
 25 **STANSBERRY**, individually and on behalf of
 all others similarly situated,

26 DATED: December 11, 2015

By: s/J. Dominick Larry

27 **EDELSON PC**
 28 Jay Edelson (Admitted *pro hac vice*)

1 jedelson@edelson.com
2 Rafey S. Balabanian (Admitted *pro hac vice*)
3 rbalabanian@edelson.com
4 Benjamin H. Richman (Admitted *pro hac vice*)
5 brichman@edelson.com
6 Christopher L. Dore (Admitted *pro hac vice*)
7 cdore@edelson.com
8 J. Dominick Larry (Admitted *pro hac vice*)
9 nlarry@edelson.com
10 350 North LaSalle Street, Suite 1300
11 Chicago, Illinois 60654
12 Tel: 312.589.6370
13 Fax: 312.589.6378

14 **LAW OFFICES OF RONALD A. MARRON,**
15 **RONALD A. MARRON**
16 **SKYE RESENDES**
17 **ALEXIS M. WOOD**
18 **KAS L. GALLUCCI**
19 651 Arroyo Drive
20 San Diego, California 92103
21 Telephone: (619) 696-9006
22 Facsimile: (619) 564-6665

23 **LAW OFFICES OF DOUGLAS J.**
24 **CAMPION, APC**
25 **DOUGLAS J. CAMPION**
26 *doug@djcampion.com*
27 409 Camino Del Rio South, Suite 303
28 San Diego, California 92108
Telephone: (619) 299-2091
Facsimile: (619) 858-003

Keith J. Keogh (Admitted *pro hac vice*)
keith@keoghlaw.com
KEOGH LAW, LTD.
55 W. Monroe Street, Ste. 3390
Chicago, Illinois 60603
Tel: 312.726.1092
Fax: 312.726.1093

Attorneys for Plaintiffs and the Proposed Class

DATED: December 11, 2015

By: s/James K. Schultz

James K. Schultz (*pro hac vice*)

Michael D. Slodov (*pro hac vice*)

**SESSIONS FISHMAN, NATHAN & ISRAEL,
L.L.C.**

Attorneys for Defendant

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained its approval for his electronic signature to this document.

DATED: December 11, 2015 By: s/ J. Dominick Larry